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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Maria Lourdes Dela Torre,	)	Case No. 1:23-cv-01160-BAM
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del>
vs.	)	ORDER FOR EXTENSION OF
	)	TIME
Kilolo Kijakazi, Acting	)	
Commissioner of Social Security,	)	
Defendant.	)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from December 11, 2023 to February 9, 2024, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due

1 on the same week. For the weeks of December 11, 2023 and December 18, 2023,  
2 Counsel has eighteen merit briefs due. Counsel requires additional time to brief  
3 the issues thoroughly for the Court's consideration. Defendant does not oppose the  
4 requested extension. Counsel apologizes to the Defendant and Court for any  
5 inconvenience this may cause.

6  
7 Respectfully submitted,

8 Dated: November 29, 2023 PENA & BROMBERG, ATTORNEYS AT LAW  
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10 By: /s/ Dolly M. Trompeter  
11 DOLLY M. TROMPETER  
12 Attorneys for Plaintiff  
13

14 Dated: November 29, 2023 PHILLIP A. TALBERT  
15 United States Attorney  
16 MATTHEW W. PILE  
17 Associate General Counsel  
18 Office of Program Litigation, Office 7

19 By: \*/s/ Franco L. Becia  
20 Franco L. Becia  
21 Special Assistant United States Attorney  
22 Attorneys for Defendant  
23 (\*As authorized by email on November 29, 2023)  
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**ORDER**

Pursuant to stipulation and good cause appearing, IT IS SO ORDERED that Plaintiff shall file and serve Defendant with Plaintiff's Motion for Summary Judgment on or before February 9, 2024.

IT IS SO ORDERED.

Dated: November 30, 2023

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE